

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**IN RE GWG HOLDINGS, INC.
SECURITIES LITIGATION**

Civil Action No. 3:22-cv-00410-B

CLASS ACTION

This Document Relates To: All Actions

**AGREED MOTION REGARDING CLAIMS OF LEAD PLAINTIFFS
AGAINST DEFENDANT WHITLEY PENN LLP**

Following negotiations supervised by the mediator, Lead Plaintiffs and Defendant Whitley Penn have reached an agreement in principle to settle the claims against Whitley Penn. After consultation with the mediator, Lead Plaintiffs and Whitley Penn respectfully request that the Court enter two forms of relief that will ensure the orderly progress of this litigation:

- *First*, an order that Whitley Penn’s pending motion to dismiss (Doc. 91) is withdrawn without prejudice to its refiling if the settlement between Lead Plaintiffs and Whitley Penn is not approved or is otherwise terminated.
- *Second*, a 90-day stay of the claims against Whitley Penn, to allow Lead Plaintiffs and Whitley Penn to memorialize their settlement and submit the executed agreement for Court approval.

Lead Plaintiffs believe a 90-day stay may, depending on the progress of any further mediation efforts with other Defendants, allow for submission of the Whitley Penn settlement concurrently with any other settlements that may be reached, thereby minimizing the work of the

Court while also avoiding duplicative notices to Class members and reducing the overall expense to the Class and the potential for confusion.

Accordingly, Lead Plaintiffs and Whitley Penn respectfully request that the Court enter the proposed order providing for the two forms of relief stated above. The parties have conferred with the mediator, and are authorized to represent that the mediator agrees that this request is made in good faith, and will further the interests of fairness and efficiency.

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Dated: March 11, 2024

/s/ Daniel C. Girard

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(a), I hereby certify that this motion has been agreed to after conferences with counsel for Whitley Penn regarding the relief requested herein.

/s/ Daniel C. Girard

Daniel C. Girard

CERTIFICATE OF SERVICE

This is to certify that on March 11, 2024, I have filed the above and foregoing on the Court's CM/ECF electronic filing system, and that by virtue of this filing, all attorneys of record will be served electronically with true and exact copies of this filing.

/s/ Daniel C. Girard

Daniel C. Girard